

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ASHLEY PARHAM, JANE DOE, and
JOHN DOE,

Plaintiffs,

vs.

SEAN COMBS, KRISTINA
KHORRAMN, SHANE PEARCE,
RUBEN VALDEZ, JOHN
PELLETIER, ODELL BECKHAM JR.,
DREW DESBORDES, JACQUELYN
WRIGHT, HELENA HARRIS-SCOTT,
MATIAS GONZALEZ, BRANDI
CUNNINGHAM, JANICE COMBS,
KEITH LUCKS, and JOHN AND
JANE DOES 1-10,

Defendants.

Case No. 3:24-CV-07191-RFL

Assigned to Hon. Rita F. Lin

**[PROPOSED] ORDER REGARDING
DEFENDANT DREW DESBORDES'
MOTION FOR THE IMPOSITION
OF SANCTIONS AGAINST
PLAINTIFFS AND THEIR COUNSEL
PURSUANT TO FED. R. CIV. P. 11**

[PROPOSED] ORDER

After considering the motion of Defendant Drew Desbordes for the motion of sanctions against plaintiffs and their counsel pursuant to Federal Rule of Civil Procedure 11, the declarations of Drew Desbordes and David Grossman and the accompanying exhibits the Court finds that the claims against Mr. Desbordes in Plaintiffs' amended complaint are without factual foundation and Plaintiffs attorneys failed to conduct a reasonable and competent inquiry before signing and filing it. Accordingly, the Court orders Plaintiffs and their counsel, Shawn R. Perez and Ariel Mitchell, are sanctioned, jointly and severally, in an amount equal to the reasonable attorneys' fees and costs incurred by Mr. Desbordes and Plaintiffs' claims against Mr. Desbordes shall be dismissed with prejudice.

IT IS SO ORDERED.

Dated: _____, 2025

Hon. Rita F. Lin
United States District Court Judge